

1
2
3
4
5
6
7 UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

8 In re:

9 SOLEADOS ESTATES, LLC,
10 Debtor.
11

NO. 23-00196-WLH13

DECLARATION OF JASON GANG

12 I, Jason A. Gang, declare:

13 1. I am a Member of The Law Offices of Jason Gang, PLLC, whose office is
14 located at 1245 Hewlett Plaza, Suite 478, Hewlett, NY 11557. I am in good standing with the
15 New York Bar Association, have personal knowledge of the matters herein and am competent
16 to testify to the same.

17 2. Our Firm was retained by Spartan Business Solutions, LLC d/b/a Spartan
18 Capital ("Spartan") to pursue a commercial collection matter against Sullinair Jet Center, LLC;
19 Soleados Estates, LLC; Pasco FBO Partners, LLC; ASI ES La Vida, LLC; Capital Strategies &
20 Developing, LLC; Rentafleet, LLC; and John A Sullins (collectively "Debtors").

21 3. Pursuant to a venue and jurisdiction provision in the parties' written documents,
22 our Firm commenced a lawsuit against Debtors in the Supreme Court of the State of New
23 York, County of Monroe, under cause number E2022008026; and on November 17, 2022, the
24
25

DECLARATION OF JASON GANG - 1

Green & Norwood PLLC
2284 W. Commodore Way, Suite 300
Seattle, Washington 98199
(206) 420-3486

2178-101

1 Court entered a Judgment against Debtors in the amount of \$40,172.65 ("Judgment"). See Ex.
2 A attached hereto.

3 4. At the time the Judgment was entered, our Firm was unaware of any bankruptcy
4 filings commenced by any of the Debtors.

5 5. In fact, it was not until December 14, 2022, that our Firm became aware of the
6 bankruptcy filings by both Debtors Sullinair Jet Center, LLC; and Pasco FBO Partners, LLC.
7 See Ex. B attached hereto.

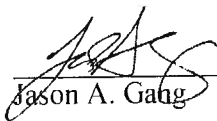
8 6. Our Firm subsequently retained Matthew Green at Green & Norwood, PLLC to
9 domesticate the Judgment into the Washington State Court system for enforcement purposes.

10 7. Upon reviewing the pleadings submitted by Debtors' counsel to this Court, our
11 Firm became aware for the first time that Debtors Sullinair Jet Center, LLC; and Pasco FBO
12 Partners, LLC respective bankruptcy filings occurred prior in time to entry of the Judgment.
13 As such, our Firm has filed the requisite pleadings with the New York Court to have the
14 Judgment Amended by removing both Sullinair Jet Center, LLC; and Pasco FBO Partners,
15 LLC as judgment debtors. See Ex. C attached hereto.

16 8. Judgment. If the Debtor Mr. Sullins believes he possesses a legal basis to
17 challenge entry of the Judgment against him, he can certainly bring a CR 60 Motion in the New
18 York Court in which the Judgment was entered, which to date he has not undertaken.

19 The foregoing statement is made under penalty of perjury under the laws of the State of
20 Washington and is true and correct.

21 Signed at Hewlett, New York, this 25th day of April, 2023.

22
23 
24 Jason A. Gang
25

DECLARATION OF JASON GANG - 2

Green & Norwood PLLC
2284 W. Commodore Way, Suite 300
Seattle, Washington 98199
(206) 420-3486